

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

**J. CASARETTI; J.V.; D.P.; T.S.; K.A.;
B.T.; A.W.; K.B.; E.M.; D.C.; V.J.; L.L.;
R.G.; and FEDERAL AIR MARSHALS
6500 TO 12000,**

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No.: 1:15-cv-00294-VJW

Judge V. Wolski

JOINT STATUS REPORT

Counsel for Plaintiff, J. Casaretti, *et al.* (hereinafter collectively “Plaintiffs”), and counsel for Defendant, the United States, conferred pursuant to the Court’s order dated April 25, 2022 (ECF 155), and respectfully submit the following Joint Status Report updating the Court on the progress of discovery.

Since the parties’ last status report dated April 22, 2022 (ECF 154), the parties have continued document productions pursuant to requests served by Plaintiffs and Defendant. To date, thousands of pages of additional documents have been exchanged between the parties. At the present time, Defendant anticipates a final disclosure of approximately 2,400 additional documents on or before July 31, 2022. The parties have worked cooperatively to facilitate document disclosures and exchange of responsive materials and supplements to respective document production requests.

In tandem with ongoing document productions, the parties have scheduled deposition discovery. At the present time, depositions of the following witnesses affiliated with Defendant are scheduled, both in their individual capacities as well as pursuant to RCFC 30(b)(6): Kenneth Fine, July 26, 2022; Nick Ezzre, July 27, 2022. The 30(b)(6) deposition may need to be continued

dependent on the testimony of the proffered witnesses and the availability of other individuals with knowledge of the topics involved in the notice. Further, the parties are working to schedule the deposition of Robert Gross, a retired TSA employee, for a convenient date within the next 30 days. In addition, Defendant may seek depositions of certain plaintiffs if their testimony is to be relied upon in any motion for summary judgment Plaintiffs may seek to file.

In light of the ongoing nature of discovery and fact investigation, the parties respectfully propose that the currently-scheduled Court status check, calendared for August 1, 2022, be continued for approximately 30 days to a date convenient for the Court's calendar so that the current depositions noticed by Plaintiff may be completed. The parties propose supplementing this report with an updated status report to the Court no later than seven days prior to the continued status conference date.

Dated this 25th day of July, 2022.

Respectfully submitted,

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